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Case No.: 19-43385-BDL

OBJECTION TO CONFIRMATION WITH STRICT COMPLIANCE

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OBJECTION

- ☐ Plan is not feasible:
- ☐ Plan is not proposed in good faith or is forbidden by law:
- ☒ Plan fails to commit all excess disposable income for the applicable commitment period as required by 11 U.S.C. § 1325(b)(1)(B): Trustee requires evidence of how much debtor is actually required to pay per line 19 of form 122C2.
- ☒ Plan does not meet the best interests of creditors test as required by 11 U.S.C. § 1325(a)(4): Debtor must provide additional evidence of the value of both parcels of real property.
- ☒ Schedules or other documentation insufficient: Debtor must provide an address for noticing of the DSO recipient.
- ☐ Other:

WHEREFORE, Trustee requests that the objection to confirmation be sustained and debtors be ordered to file a motion to confirm a plan resolving the issues raised herein within 14 days of entry of the Order Sustaining Trustee's Objection to Confirmation; and to set the hearing on the next available motion calendar after the 14 days expires. If the Motion to Confirm resolving the Trustee's issues is not filed and set for hearing as outlined above, the Trustee requests he be allowed to enter an order dismissing the case, *ex parte*, without notice.

DATED this 1st day of December, 2019.

/s/ Matthew J.P. Johnson
Matthew J.P. Johnson, WSBA# 40476 for
Michael G. Malaier, Chapter 13 Trustee